

LAW OFFICES OF RAHUL WANCHOO

Attorneys for Defendant
Fuchuen Dihai Shipping Co. Ltd.
Empire State Building
350 Fifth Avenue, Suite 3304
New York, New York 10118
Phone: (201) 882-0303
Fax: (201) 301-3576
E-mail: rwanchoo@wanchoolaw.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRANSFIELD ER CAPE LIMITED

Plaintiff,

ECF CASE

07 cv 4528 (MGC)

- against -

NOTICE OF MOTION

FUCHUEN DIHAI SHIPPING CO. LTD., AND
ZHEJIANG FUCHUEN CO. LTD.

Defendants.

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PLEASE TAKE NOTICE that, pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(d), and upon the annexed Affidavit of Rahul Wanchoo, the exhibits annexed thereto, and the supporting Memorandum of Law, the Defendant **FUCHUEN DIHAI SHIPPING CO. LTD.**, will move as soon as counsel may be heard for an Order dismissing the Verified Complaint and vacating the Process Of Maritime Attachment And Garnishment.

Dated: New York, New York
July 2, 2007

LAW OFFICES OF RAHUL WANCHOO
Attorneys for Defendant
FUCHUEN DIHAI SHIPPING CO. LTD.

By: Rahul Wanchoo
Rahul Wanchoo (RW-8725)

cc. Lennon, Murphy & Lennon, LLC
Attorneys for Plaintiff
Transfield ER Cape Limited.
420 Lexington Avenue
Suite 300
New York, NY 10170

Attn: Nancy R. Peterson, Esq.
Patrick F. Lennon

Chalos, O'Connor & Duffy, LLP
Attorneys for Defendant,
Zhejiang Fuchuen Co. Ltd.
366 Main Street
Port Washington, New York 110050

Attn: Owen F. Duffy, Esq.
George E. Murray